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6 Attorneys for Defendant Pamela Zimba

7 UNITED STATES DISTRICT COURT

8 NORTHERN DISTRICT OF CALIFORNIA

9 Christine Chang, individually and as Guardian ) Case No.: C 07 4005 EMC  
 ad litem for Eric Sun, disabled, )  
 10 Plaintiff, )  
 vs. )  
 12 Rockridge Manor Condominium, et al., )  
 13 Defendants. )  
 14 Date:  
 Time:  
 Courtroom: C  
 Magistrate Judge: Edward M. Chen

15 Complaint Filed: August 3, 2007

16 The undersigned, Andrew R. Adler, declares:

17 1. That I am a duly-admitted member of the California State Bar and the Bar of the  
 18 United States District Court for the Northern District of California, and a shareholder in  
 19 Boornazian, Jensen & Garthe, a Professional Corporation. In those capacities I am appearing as  
 20 counsel for defendant Pamela Zimba in the instant action, and am familiar with the pleadings and  
 21 proceedings therein.

22 2. If called as a witness in the instant action I could competently testify to the facts  
 23 stated in this declaration from first-hand, personal knowledge.

24 3. The document attached hereto as Exhibit 1 is a certified copy of the Alameda  
 25 County Superior Court's minutes of August 5, 2004 with respect to its action #2002-046048,  
*Chang v. Celaya*, one of the two Alameda County Superior Court actions referred to in plaintiff's  
 27 Complaint in the instant action.

1       4. The document attached hereto as Exhibit 2 is a certified copy of the Alameda  
2 County Superior Court's Judgment in *Chang v. Celaya*.

3       5. The document attached hereto as Exhibit 3 is a true and correct copy of plaintiff  
4 Christine Chang's June 4, 2005 letter to the Office of the Chief Counsel/Intake of the State Bar of  
5 California, as submitted to this Court by Ms. Chang on October 31, 2007 as Exhibit 3.1 to her  
6 Plaintiffs' Opposition to Defendants The University of California Berkeley Motion to Dismiss in  
7 the instant action.

8       6. The document attached hereto as Exhibit 4 is a certified copy of Ms. Chang's  
9 Request for Dismissal (with prejudice) of Alameda County Superior Court action #2001-023364,  
10 *Chang v. Ammann*, the second of the two Alameda County Superior Court actions to which  
11 plaintiff refers, as filed April 5, 2005.

12       7. This declaration was executed under penalty of perjury under the laws of the State  
13 of California and the United States of America at Oakland, California this 5<sup>th</sup> day of November,  
14 2007.



Andrew R. Adler